

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NATHAN COHEN TRUST; NATHAN COHEN,
individually and in his capacity as Trustee of the
Nathan Cohen Trust; DAVID B. COHEN, in his
capacity as Trustee of the Nathan Cohen Trust; and
JONATHAN R. COHEN, in his capacity as Trustee
of the Nathan Cohen Trust,

Defendants.

Adv. Pro. No. 10-04850 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including January 12, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: November 24, 2014
New York, New York

By: /s/ Nicholas J. Cremona

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Marc E. Hirschfield

Email: mhirschfield@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: November 24, 2014
New York, New York

By: /s/ Michael I. Goldberg

AKERMAN LLP

666 Fifth Avenue, 20th Floor

New York, New York 10103

Telephone: (212) 880-3800

Facsimile: (212) 880-8965

Michael I. Goldberg

Email: Michael.goldberg@akerman.com

Attorneys for Defendant Nathan Cohen

Dated: November 24, 2014
New York, New York

By: /s/ Melanie L. Cyganowski

OTTERBOURG P.C.

230 Park Avenue

New York, New York 10169-0075

Telephone: (212) 661-9100

Facsimile: (917) 368-7121

Melanie L. Cyganowski

Email: mcyganowski@otterbourg.com

Mediator